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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RAYMOND HALWIX,

Plaintiff,

v.

NANCY A. BERRYHILL,
Deputy Commissioner for Operations,
performing the duties and functions not
reserved to the Commissioner of Social
Security,

Defendant.

Case No. 2:17-cv-02263-APG-CWH

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME OF 7 DAYS
FOR DEFENDANT TO FILE
OPPOSITION TO PLAINTIFF'S
MOTION TO REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 7 days to file her opposition to Plaintiff's motion to remand, to be continued from March 22, 2018, to March 29, 2018.

This is the first continuance in this case sought by Defendant. There is good cause for this request. Since the filing of Plaintiff's motion for remand, Defendant's counsel has been diligently

1 addressing her full workload including several district court cases and one Equal Employment
2 Opportunity Commission matter involving briefing. Moreover, recently, Defendant's counsel was
3 assigned previously unanticipated work, including the appeal of a recently received decision, with the
4 appeal due around the same time as the original due date of Defendant's response in this case, that could
5 not be assigned to another attorney and that could not be extended.

6 Because of the factors described above, Defendant is requesting additional time up to and
7 including March 29, 2018, to fully review the administrative record and research the issues presented by
8 Plaintiff's motion to remand. This request is made in good faith with no intention to unduly delay the
9 proceedings. Therefore, with this Court's approval, the Court's scheduling order shall be extended by 7
10 days, so that Defendant may file her opposition to Plaintiff's motion to remand on or before March 29,
11 2018.

12 Respectfully submitted,

13
14 Dated: March 22, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

15 /s/ Cyrus Safa
16 (as authorized via e-mail on 3/22/2018)
17 CYRUS SAFA
Attorneys for Plaintiff

18 Dated: March 22, 2018

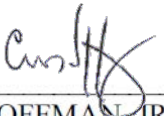
DAYLE ELIESON
United States Attorney

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20 /s/ Carolyn B. Chen
21 CAROLYN B. CHEN
Special Assistant United States Attorney

22 IT IS SO ORDERED.

23 DATED: March 23, 2018

24
25 ORDER

26 
C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

1 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
2

3 DATED: _____
4

HON. C.W. HOFFMAN, JR.
UNITED STATE MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I, **Carolyn B. Chen**, certify that the following individual was served with a copy of the
3 **STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME OF 7 DAYS FOR**
4 **DEFENDANT TO FILE OPPOSITION TO PLAINTIFF'S MOTION TO REMAND** on the date
and via the method of service identified below:

5 **CM/ECF:**

6 **Cyrus Safa**
7 **Law Offices of Lawrence D. Rohlfsing**
8 **12631 East Imperial Highway, Suite C-115**
9 **Santa Fe Springs, CA 90670**
10 **Cyrus.Safa@rohlfsinglaw.com**

11 **Leonard H Stone**
12 **Shook & Stone Chtd.**
13 **710 S. Fourth St.**
14 **Las Vegas, NV 89101**
15 **Email: lstone@shookandstone.com**

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Dated this 22nd day March 2018.

/s/ Carolyn B. Chen
CAROLYN B. CHEN
Special Assistant United States Attorney